

6/11/2021 8:16 AM  
21CV23771

IN THE CIRCUIT COURT FOR THE STATE OF OREGON  
FOR MULTNOMAH COUNTY

**CHRISTOPHER FRISON**  
a Portland resident

Plaintiff

vs

**JOHN DOE**  
an unidentified federal agent

Defendant

Case No.

**COMPLAINT**

Assault with a Firearm

Not Subject to Mandatory Arbitration  
Amount in Controversy: \$1 million  
Fee Authority: ORS 21.160(1)(e)  
Jury Trial Requested

**1.**

**FACTUAL ALLEGATIONS**

On July 27, 2020, Mr. Doe aggressively pointed a semiautomatic handgun at Mr. Frison's chest, causing Mr. Frison to fear for his life and causing him fright and horror and nightmares.

**2.**

Mr. Doe occupied room 428 at the Residence Inn by Marriott at 1250 N Anchor Way in Portland, Oregon on July 27, 2020 where Mr. Frison worked as a maintenance person. Mr. Doe was in Portland for several days on business as a federal agent deployed by Donald Trump to tamp down protests. According to the *New York Times*, the federal agents deployed in Portland by Donald Trump did not have proper training.

**COMPLAINT** – Page 1 of 4

1  
2 **3.**

3 At approximately 4:00pm, Mr. Frison responded to a maintenance request to  
4 unclog the toilet in Mr. Doe's room. Mr. Frison knocked on Mr. Doe's door and  
5 identified himself as a maintenance person. Mr. Doe violently swung open the door,  
6 and with an aggressive look on his face, pointed a semiautomatic handgun at Mr.  
7 Frison's chest. Mr. Frison put his hands in the air and prepared to be killed. Mr. Doe  
8 ultimately lowered his handgun and then invited Mr. Frison into his room. Mr.  
9 Frison declined the invitation, handed Mr. Doe the toilet plunger, and quickly left  
10 room 428.  
11  
12

13 **4.**

14 Mr. Doe intentionally traveled to Oregon for business, stayed in Oregon  
15 overnight, purchased goods and services in Oregon, earned a living in Oregon, and  
16 chose to carry a semiautomatic handgun in Oregon, and so has minimum contacts  
17 in Oregon so that this Court's exercise of jurisdiction over him constitutes fair play  
18 and substantial justice.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2 **5.**

3 **CLAIM FOR RELIEF**

4 **Assault**

5  
6 As alleged in this complaint, Mr. Doe intentionally attempted to engage in  
7 harmful or offensive contact with Mr. Frison, and had the present ability to carry  
8 the intention into effect, causing Mr. Frison extreme emotional distress. As a result,  
9 Mr. Doe requests fair compensation in an amount determined by the jury to be fair,  
10 not to exceed \$1 million, and attorney fees, costs, and disbursements. Mr. Frison  
11 reserves the right to amend this complaint to adjust the request for compensation to  
12 conform to the evidence as well as to add additional defendants and new claims,  
13 including a claim for punitive damages, as new information is learned in discovery.  
14  
15

16 **6.**

17 **REQUEST FOR JURY TRIAL**

18 Mr. Frison respectfully requests a trial by a jury.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

7.

**PRAYER FOR RELIEF**

Mr. Frison respectfully requests relief as sought above, and maximum interest, and any other relief the Court deems appropriate.

June 11, 2021

**RESPECTFULLY FILED,**

/s/ Michael Fuller

**Michael Fuller, OSB No. 09357**

Lead Trial Attorney for Plaintiff

OlsenDaines

US Bancorp Tower

111 SW 5th Ave., Suite 3150

Portland, Oregon 97204

[michael@underdoglawyer.com](mailto:michael@underdoglawyer.com)

Direct 503-222-2000

**Kelly Doe, OSB No. 074217**

Of Attorneys for Plaintiff

The Law Office of Kelly Jones

[kellydonovanDoe@gmail.com](mailto:kellydonovanDoe@gmail.com)

Verified Correct Copy of Original 8/27/2021

FILED

21 AUG 26 PM 2:28

JUDICIAL DIST.

IN THE CIRCUIT COURT FOR THE STATE OF OREGON  
FOR MULTNOMAH COUNTY

**CHRISTOPHER FRISON**

Plaintiff

vs

**JOHN DOE**

Defendant

Case No. 21CV23771

**PLAINTIFF'S MOTION FOR  
CONTINUANCE**

*ex parte*

Oral Argument: Not Requested  
Estimated Time: N/A  
Court Reporting: Not Requested

**CERTIFICATION**

This motion is not opposed.

**UTCR 5.050 STATEMENT**

I do not request oral argument nor official court reporting services.

**MOTION FOR CONTINUANCE – Page 1 of 3**

\_Verified Correct Copy of Original 8/27/2021.\_

**STATEMENT OF AUTHORITY**

Under UTCR 7.020(2) and this Court's inherent authority, plaintiff moves for a continuance for good cause of 120 days, so plaintiff may continue working to identify the defendant.

**DECLARATION**

I, Michael Fuller, declare the following under penalty of perjury:

1. Plaintiff has worked in good faith from the beginning of this case to identify the defendant. Plaintiff hired various private investigators served various subpoenas to identify the defendant.
2. Plaintiff has subpoenaed the hotel where the incident alleged in the complaint occurred and is working with the hotel's counsel to identify the defendant.
3. On August 25, 2021, the Court entered a notice of intent to dismiss in 28 days for want of prosecution.
4. I know the facts I am testifying about based on my personal knowledge. I declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

**MOTION FOR CONTINUANCE – Page 2 of 3**

\_Verified Correct Copy of Original 8/27/2021.\_

**CONCLUSION**

As explained above, good cause exists to continue this case for 120 days while plaintiff continues working to identify the defendant.

August 25, 2021

**RESPECTFULLY FILED,**

/s/ Michael Fuller  
**Michael Fuller, OSB No. 09357**  
OlsenDaines  
US Bancorp Tower  
111 SW 5th Ave., Suite 3150  
Portland, Oregon 97204  
michael@underdoglawyer.com  
Direct 503-222-2000

**MOTION FOR CONTINUANCE – Page 3 of 3**

## PLACEHOLDER

“Order – Rule 7 Service Postponement Granted”  
not digitally accessible.



9/30/2021 8:36 AM  
21CV23771

IN THE CIRCUIT COURT FOR THE STATE OF OREGON  
FOR MULTNOMAH COUNTY

**CHRISTOPHER FRISON**

Plaintiff

vs

**JOSHUA ALLAN JONES**

Defendant

Case No. 21CV23771

**COMPLAINT  
FIRST AMENDED**

Assault with a Firearm

Not Subject to Mandatory Arbitration  
Amount in Controversy: \$1 million  
Fee Authority: ORS 21.160(1)(e)  
Jury Trial Requested

**1.**

**FACTUAL ALLEGATIONS**

On July 27, 2020, Mr. Jones aggressively pointed a semiautomatic handgun at Mr. Frison's chest, causing Mr. Frison to fear for his life and causing him fright and horror and nightmares.

**2.**

Mr. Jones occupied room 428 at the Residence Inn by Marriott at 1250 N Anchor Way in Portland, Oregon on July 27, 2020 where Mr. Frison worked as a maintenance person. Mr. Jones was in Portland for several days on business as a federal agent deployed by Donald Trump to tamp down protests. According to the *New York Times*, the federal agents deployed in Portland by Donald Trump did not have proper training.

**COMPLAINT** – Page 1 of 4

1  
2 **3.**

3 At approximately 4:00pm, Mr. Frison responded to a maintenance request to  
4 unclog the toilet in Mr. Jones's room. Mr. Frison knocked on Mr. Jones's door and  
5 identified himself as a maintenance person. Mr. Jones violently swung open the door,  
6 and with an aggressive look on his face, pointed a semiautomatic handgun at Mr.  
7 Frison's chest. Mr. Frison put his hands in the air and prepared to be killed. Mr.  
8 Jones ultimately lowered his handgun and then invited Mr. Frison into his room.  
9 Mr. Frison declined the invitation, handed Mr. Jones the toilet plunger, and quickly  
10 left room 428.  
11  
12

13 **4.**

14 Mr. Jones intentionally traveled to Oregon for business, stayed in Oregon  
15 overnight, purchased goods and services in Oregon, earned a living in Oregon, and  
16 chose to carry a semiautomatic handgun in Oregon, and so has minimum contacts  
17 in Oregon so that this Court's exercise of jurisdiction over him constitutes fair play  
18 and substantial justice.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2 **5.**

3 **CLAIM FOR RELIEF**

4 **Assault**

5  
6 As alleged in this complaint, Mr. Jones intentionally attempted to engage in  
7 harmful or offensive contact with Mr. Frison, and had the present ability to carry  
8 the intention into effect, causing Mr. Frison extreme emotional distress. As a result,  
9 Mr. Jones requests fair compensation in an amount determined by the jury to be  
10 fair, not to exceed \$1 million, and attorney fees, costs, and disbursements. Mr. Frison  
11 reserves the right to amend this complaint to adjust the request for compensation to  
12 conform to the evidence as well as to add additional defendants and new claims,  
13 including a claim for punitive damages, as new information is learned in discovery.  
14  
15

16 **6.**

17 **REQUEST FOR JURY TRIAL**

18 Mr. Frison respectfully requests a trial by a jury.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

7.

**PRAYER FOR RELIEF**

Mr. Frison respectfully requests relief as sought above, and maximum interest, and any other relief the Court deems appropriate.

September 30, 2021

**RESPECTFULLY FILED,**

/s/ Michael Fuller

**Michael Fuller, OSB No. 09357**

Lead Trial Attorney for Plaintiff

OlsenDaines

US Bancorp Tower

111 SW 5th Ave., Suite 3150

Portland, Oregon 97204

[michael@underdoglawyer.com](mailto:michael@underdoglawyer.com)

Direct 503-222-2000

**Kelly Jones, OSB No. 074217**

Of Attorneys for Plaintiff

The Law Office of Kelly Jones

[kellydonovanJones@gmail.com](mailto:kellydonovanJones@gmail.com)

10/18/2021 4:02 PM  
21CV23771

### AFFIDAVIT OF SERVICE

State of Oregon

County of Multnomah

Circuit Court

Case Number: 21CV23771

Plaintiff: **Christopher Frison**

vs.

Defendant: **John Doe "Joshua Jones"**

For: Michael Fuller  
Olsen Daines

Received by PI Services LLC to be served on **Joshua Allan Jones, 4320 W. 12th Place, Yuma, AZ 85364**. I, Rolando Valdez, being duly sworn, depose and say that on the 8th day of October, 2021 at 2:23 p.m., executed service by delivering a true copy of the **Introduction Letter; Summons; Complaint; Initial Requests for Production; Proposed Deposition Notice; Motion for Electronic Service; Payment Terms and Conditions; Blank Dismissal and Judgment** in accordance with state statutes in the manner marked below:

☒ INDIVIDUAL SERVICE: Served the within-named person.

☐ SUBSTITUTE/OFFICE SERVICE: By serving \_\_\_\_\_ as \_\_\_\_\_ (No Submailing)

☐ SUBSTITUTE/OFFICE SERVICE & SUBMAILING: By serving \_\_\_\_\_ as \_\_\_\_\_. And I mailed a true copy of the documents and a copy of this Affidavit of Service to the Defendant's address listed above by first class mail on \_\_\_\_/\_\_\_\_/2021.

☐ POSTED SERVICE: I Posted a true copy to a conspicuous place on the property described herein and mailed a true copy of the service documents to the above address by first class mail on \_\_\_\_/\_\_\_\_/2021.

☐ POSTED SERVICE: I Posted a true copy to a conspicuous place on the property described herein.

☐ NON SERVICE: For the reason detailed in the Comments below.

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I certify that I have no interest in the above action, am of legal age & have proper authority in the jurisdiction in which this service was made. I am a competent person over 18 years of age and a resident of this State; I am not a party to nor an officer, director or employee of, nor attorney for any party. I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court & is subject to penalty for perjury.

Subscribed and Sworn to before me on the 8th day of October, 2021 by the affiant who is personally known to me.

M-B R

NOTARY PUBLIC

PI Services LLC  
PROCESS SERVER # YUPS7-26  
Appointed in accordance with State Statutes

**PI Services LLC**  
**P.O. Box 157**  
**Beaverton, OR 97075-0157**  
**(503) 643-4274**

Our Job Serial Number: 2021001855



Copyright © 1992-2021 Database Services, Inc. - Process Server's Toolbox V8.2b